

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on)	
Universal Service)	CC Docket No. 96-45
)	
Advantage Cellular Systems, Inc.)	
)	
Application for Designation as an)	
Eligible Telecommunications Carrier)	
in the State of Tennessee)	

To: Wireline Competition Bureau

SECOND SUPPLEMENT

**ADVANTAGE CELLULAR
SYSTEMS, INC.**

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Dated: May 18, 2004

SECOND SUPPLEMENT

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SECOND SUPPLEMENT

Advantage Cellular Systems, Inc. (“Advantage”), by its attorneys, hereby submits this Second Supplement to its Petition to be Designated as an Eligible Telecommunications Carrier (“ETC”) in the state of Tennessee (“Petition”).¹ On February 17, 2004, Advantage filed its Supplement to its Petition (“Supplement”) with the Federal Communications Commission (“FCC” or “Commission”). On March 25, 2004, Leslie Greer, Chief Executive Officer of Advantage, and Advantage’s attorneys met with FCC staff who encouraged Advantage to further supplement its Petition to: (1) identify exact locations of the additional towers which Advantage plans to build once it receives Universal Service Fund (“USF”) support and the proposed dates that these

¹ *In the Matter of Federal-State Joint Board on Universal Service, Advantage Cellular Systems, Inc., Application for Designation as an Eligible Telecommunications Carrier in the State of Tennessee*, CC Docket No. 96-45 (May 9, 2003) (“Petition”).

towers will be constructed; (2) provide the FCC with a larger map indicating the locations of Advantage's proposed towers; and (3) provide additional population density information in both served and unserved portions of Advantage's service territory. The requested information is provided herein.²

Advantage is also amending its Petition and Supplement to reflect that Advantage serves only the Estill Springs wire center of United Telephone Company's ("United") service territory.

I. Supplemental Information Requested by FCC Staff

Pursuant to the FCC staff's request, Advantage hereby further supplements its Petition with detailed information regarding Advantage's proposed USF plan.

a. Tower Locations and Installation Dates

As stated in its Supplement, Advantage currently provides service using 38 cellular towers in Tennessee. In its Supplement, Advantage estimated that it needs to build three to five additional towers to accommodate customers that reside in areas that are difficult to serve and noted that it had already budgeted to install three towers in 2004.³ Since the filing of its Supplement, Advantage has determined that it will be more efficient for it to lease space on existing towers than to construct new towers itself. Specifically, Advantage intends to lease space on towers owned by Crown Communications Inc. in Cannon County, TN (Smithville exchange) and Warren County, TN (Centertown exchange) and a tower owned by ClearShot Communications, LLC in

² The FCC also requested that Advantage identify where in its Petition and Supplement Advantage discussed its advertising plan. Advantage affirmed that it will advertise the availability of the supported services and the availability of Lifeline and Linkup services to qualifying customers in its Petition at pages 14-15 and in its Supplement at page 8.

³ See Supplement at 6.

Coffee County, TN (Beech Grove exchange).⁴ Advantage is negotiating leases for each of these sites, and plans to execute the leases, and begin leasing space on the Smithville tower on July 1, 2004, the Beech Grove tower on September 1, 2004, and the Centertown tower on October 1, 2004. Advantage has determined that leasing space on these three towers will accommodate its customers in hard to serve areas. The exact locations of these towers are plotted on a map provided in Exhibit B.⁵

Although Advantage's build-out plans will evolve over time and these dates are subject to change, Advantage will continue to respond to consumer demand by taking additional steps to ensure quality coverage and service. In addition to its plans for a switch upgrade, GSM overlay, and installation of cell extenders described in its Supplement, Advantage is examining the feasibility of building and/or leasing space on eight more towers to upgrade its network and facilities to provide third-generation digital services. Advantage plans to build and/or lease space on new towers to alleviate concerns regarding dropped calls and poor coverage in its service area.

b. The Requested Additional Population Density Data Continues to Demonstrate that Advantage Will Not and Cannot Cream Skim

Advantage's CMRS-licensed territory covers portions of the study areas of seven rural telephone companies in Tennessee. In its Supplement, Advantage provided the results of a population density study to prove that it will not cream skim.⁶ Specifically, Advantage provided the FCC with population density information for those rural telephone company wire centers (i.e., exchanges) with which Advantage's CMRS-

⁴ See Exhibit B.

⁵ Pursuant to FCC staff's request, Advantage has provided a 17 x 23 size map.

⁶ See Supplement at 12-15. Advantage used the MapInfo Exchange Plus software and Tennessee dataset to perform this analysis.

licensed territory overlaps, in whole or in part. Upon request by the FCC staff, Advantage now provides population density information for all exchanges served by these seven rural telephone companies, regardless of whether Advantage's CMRS-licensed territory overlaps those exchanges.⁷ As discussed below, the additional population density data further demonstrates that Advantage cannot cream skim in its proposed ETC service area.

"Rural creamskimming occurs when competitors serve *only* the low-cost high revenue customers in a rural telephone company's study area."⁸ The population density data provided in Exhibit A demonstrates that Advantage does not propose to serve only the low-cost high revenue customers in those seven rural telephone companies' study areas. Nor would Advantage be primarily serving customers in low-cost, high density portions of those seven rural telephone companies.⁹

Exhibit A provides detailed population density data including individual wire center population density and the total service area population density for each ILEC with whom Advantage proposes to compete. Specifically, Advantage provides population data, total square mileage, and population density calculations for each wire center in Exhibit A. The "Coverage" column in Exhibit A identifies those ILEC wire centers that Advantage is capable of serving and for which it is seeking ETC designation. Under the

⁷ See Exhibit A.

⁸ *In the matter of Federal-State Joint Board on Universal Service, Highland Cellular Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia, Memorandum Opinion and Order*, CC Docket. 96-45, FCC 04-37 at ¶ 26 (April 12, 2004) ("*Highland Cellular Order*") (emphasis added).

⁹ *Highland Cellular Order* at ¶ 31 (holding that Highland Cellular's ETC proposal in Verizon South's study area raised cream skimming concerns because Highland Cellular would be primarily serving customers in the low-cost and high density portion of Verizon South's study area).

Coverage column, the ILEC wire centers labeled “Entire” are those wire centers that Advantage is capable of serving in their entirety. For the wire centers labeled “Partial,” Advantage is capable of serving some portion of the wire center using its own network and has committed to serve the remaining portion of that wire center through roaming or resale agreements with other carriers consistent with the Commission’s recent *Highland Cellular Order*.¹⁰ To the extent that Advantage’s CMRS-licensed service area covers only a portion of a wire center, Advantage provides separate population density information for those portions of the “Partial” wire centers within its network (noted as “Covered Under TN-2 Market”) and those portions outside its network (noted as “Not Covered Under TN-2 Market”). Lastly, under the Coverage column, the ILEC wire centers labeled “None” are the wire centers where Advantage does not propose to serve any portion of that wire center. Advantage provides data for wire centers that it does not propose to serve as an ETC pursuant to FCC request.

As indicated in Exhibit A, Advantage has proposed to serve two North Central Telephone Cooperative Inc. (“North Central”) wire centers, Pleasant Shade and Defeated, each with population densities significantly less than the North Central total population density.¹¹ The population density information proves that Advantage is not seeking to serve only the low-cost, high density wire centers of North Central’s study area. In fact, Advantage proposes to serve the least densely populated, and presumably the highest

¹⁰ *In the matter of Federal-State Joint Board on Universal Service, Highland Cellular Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia, Memorandum Opinion and Order*, CC Docket. 96-45, FCC 04-37 (April 12, 2004) (“*Highland Cellular Order*”).

¹¹ The total average population density of North Central’s study area (65.08) is almost twice as large as the total average population density of Advantage’s proposed ETC service territory (37.03).

cost, wire centers in North Central's study area. Clearly, Advantage is not attempting to cream skim.

In Bledsoe Telephone Cooperative Inc.'s ("Bledsoe") study area, Advantage is also not seeking to serve only the low-cost, high density wire centers. Advantage proposes to serve the Pikeville and Fall Creek Falls wire centers. Advantage currently serves the least densely populated portions (Pikeville: 11.24, Fall Creek Falls: 15.99) of these wire centers.¹² The complete Pikeville wire center (22.17) is the least densely populated wire center in Bledsoe's study area, while the complete Fall Creek Falls wire center (27.5) is less densely populated than Bledsoe's study area as a whole. As demonstrated by the population density data, Advantage is not seeking to serve only the low-cost, high density wire centers or even primarily serve customers in the low-cost, high density portions of Bledsoe's study area. The population density of Advantage's service territory (24.04) remains significantly less than that of Bledsoe's study area (29.60). Accordingly, Advantage is not attempting to cream skim in Bledsoe's study area.

In the Twin Lakes Telephone Cooperative Corporation ("Twin Lakes") study area, Advantage proposes to serve the following wire centers: Cookeville South, Baxter, and Chestnut Mound. Similar to the Pikeville and Fall Creek Falls wire centers in the Bledsoe study area, Advantage serves only portions of the Cookeville South and Baxter wire centers in Twin Lakes' study area. Although the Cookeville South wire center is the

¹² Advantage is not licensed to provide CMRS service throughout the entire Pikeville and Fall Creek Falls wire centers, and therefore, cannot provide the supported services using its own network. However, in compliance with the FCC's recent *Highland Cellular Order* and upon designation as an ETC in those exchanges partially covered and served by Advantage, Advantage will provide supported services throughout the Pikeville and Fall Creek Falls wire centers.

most densely populated wire center in Twin Lakes' study area, the portion that Advantage serves is the least populated (60) and is much less dense (67.64) than the total wire center (195.93). The portion of the Baxter wire center that Advantage serves is roughly half as dense as Twin Lakes' study area as a whole. In compliance with the FCC's recent *Highland Cellular Order*, Advantage now seeks to provide service throughout the Cookeville South and Baxter wire centers which will result in Advantage serving areas of greater density than originally proposed. Although the population density of the wire centers sought to be served by Advantage has increased as a result of the Commission's mandate that ETCs serve entire wire centers, Advantage is not seeking to serve only the low-cost, high density wire centers in Twin Lakes' study area. For example, Advantage does not propose to serve the Rickman, Gainesboro, and Livingston wire centers, three of the five densest wire centers in Twin Lakes' 15 wire center study area, covering over one third of the study area's population. Meanwhile, Advantage proposes to serve the entire Chestnut Mound wire center (33.60) which is less densely populated than Twin Lakes' total study area (39.85). Advantage is therefore not attempting to cream skim the low cost, high revenue customers in Twin Lakes' study area.

Advantage has proposed to provide service to the Pleasant Hill, McMinnville, Cookeville,¹³ and Sparta wire centers of Citizens Telecommunications Company of Tennessee d/b/a Frontier Communications ("Frontier"). Advantage is licensed to serve only portions of the Pleasant Hill, Cookeville, and Sparta wire centers. The portion of the

¹³ There are two Cookeville wire centers within the Twin Lakes study area. Advantage proposes to serve the Cookeville wire center with the wire center code CKVLTNXADS0. Advantage does not propose to serve the Cookeville wire center with the wire center code ALGDTNXARS0.

Pleasant Hill wire center that Advantage serves is far less dense (12.16) than the remainder of the wire center (57.58) and the total population density of the Pleasant Hill wire center (57.24) is considerably less than the population density (99.16) of Frontier's entire study area. The portion of the Cookeville wire center that Advantage serves is far less dense (31.47) than Frontier's study area as a whole (99.16). The population density of the portion of the Sparta wire center that Advantage serves (62.97) as well as that of the total Sparta wire center (63.02) is far less than Frontier's total population density (99.16). In compliance with the *Highland Cellular Order*, Advantage now seeks to provide service throughout the Pleasant Hill, Cookeville, and Sparta wire centers, which will result in Advantage serving areas of greater density than originally proposed. Advantage, however, is not seeking to serve *only* the low-cost, high revenue customers in Frontier's study area. For example, Advantage does not propose to serve the Cookeville (ALGDTNXARS0), Martin, and Sharon wire centers, three of the five densest wire centers in Frontier's 14 wire center study area. Accordingly, Advantage is not attempting to cream skim.

In United's study area, Advantage proposes to serve only the Estill Springs wire center. The portion of the Estill Springs wire center that Advantage serves is considerably less dense (49.85) than United's study area as whole (80.87). Advantage's service territory covers only a very small population (3) of Estill Springs, but Advantage has committed to serve the entire wire center in compliance with the *Highland Cellular Order*. Although adding the unserved portions of the Estill Springs wire center will result in an increase in the density of Advantage's proposed ETC service area, Advantage is not seeking to serve *only* the low-cost, high revenue customers in United's study area.

The Estill Springs wire center has the smallest population of any wire center in United's study area and its population and density are roughly one third and one half that of the Nolensville wire center which Advantage does not propose to serve. Accordingly, the population density information reveals that Advantage is not attempting to cream skim.

Finally, Advantage submits population density data for both DeKalb Telephone Cooperative, Inc. d/b/a DTC Communications ("DTC") and Ben Lomand Telephone Cooperative Inc. ("Ben Lomand"). Advantage proposes to serve as an ETC the entire service areas of these ILECs and is not seeking redefinition of these service areas. Density comparisons are therefore not relevant. Advantage provides the information, however, pursuant to Commission request.

II. Advantage Serves Only the Estill Springs Exchange of United Telephone Company

In its original Petition and its Supplement, Advantage stated that its licensed territory overlaps into the Estill Springs and College Grove portions of United's study area. In conjunction with the preparation of the attached additional population density study, Advantage conducted an engineering investigation of its licensed coverage area. The engineering report revealed that Advantage only covers the Estill Springs portion of United's study area. Advantage hereby amends its Petition and Supplement to reflect its correct coverage area by submitting revised population density information for the United study area and by providing a larger map of Advantage's coverage area. The actual population (3) covered by Advantage in the United service area is *de minimis*. In spite of the very small portion of the United exchange that Advantage can serve (less than one square mile), even smaller than originally stated, Advantage remains committed to

providing service to the entire exchange if granted ETC status in the Estill Springs
exchange.

Respectfully submitted,

**ADVANTAGE CELLULAR SYSTEMS,
INC.**

By: _____/s/_____

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Exhibit A – Population Density Data

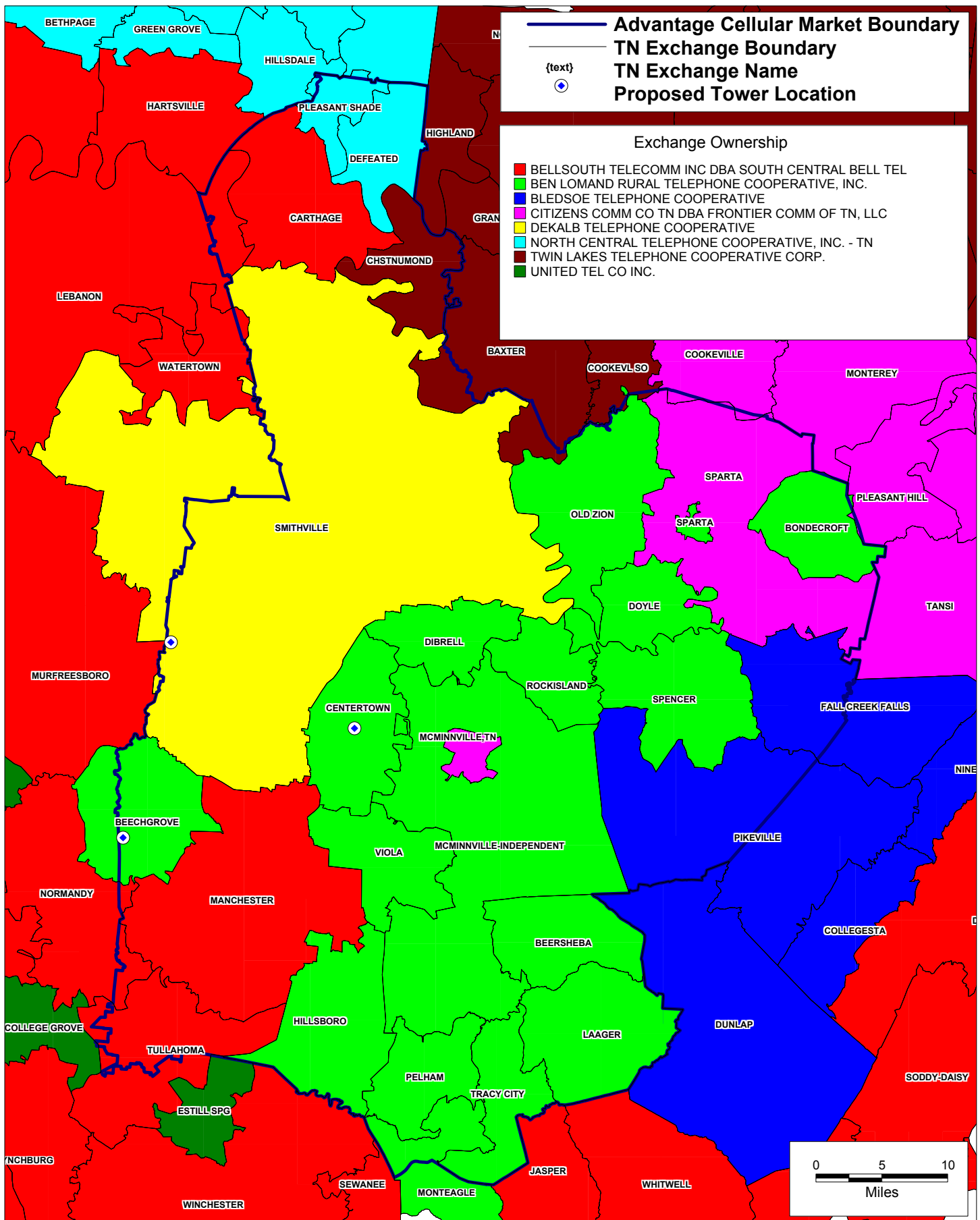
EXHIBIT A

		Total ILEC Service Area			Proposed Advantage ETC Service Area		
Coverage	ILEC by Wire Center	Population	Square Miles	Density	Population	Square Miles	Density
<u>NORTH CENTRAL</u>							
NONE	Hillsdale, TN HLDLTNXARS5	1,864	41.20	45.24			
NONE	Westmoreland, TN WMLDTNXARS5	6,433	73.06	88.05			
NONE	Green Grove, TN GNGVTNXARS5	1,615	29.42	54.89			
NONE	Lafayette, TN LFYTTNXADS1	12,381	158.70	78.02			
PARTIAL	Pleasant Shade, TN PLSHTNXARS5 (Covered Under TN-2 Market)	785	22.61	34.72	845	24.36	34.69
PARTIAL	Pleasant Shade, TN PLSHTNXARS5 (Not Covered Under TN-2 Market)	60	1.75	34.29			
NONE	Red Boiling Springs, TN RBSPTNXARS5	4,818	103.70	46.46			
ENTIRE	Defeated, TN DFTDTNXARS5	1,757	45.90	38.28	1,757	45.90	38.28
NONE	Bethpage, TN BTHPTNXARS5	2,021	41.25	48.99			
NONE	Oak Grove, TN OKGVTNXARS5	3,351	51.81	64.68			
Total Population Coverage (2000 Census Blocks):		35,085			2,602		
Total Coverage Area (square mile):			569.40			70.26	
Total Density				61.62			37.03
<u>BLED SOE</u>							
PARTIAL	Pikeville, TN PKVLTNXADS0 (Covered Under TN-2 Market)	1,451	129.10	11.24	5,376	242.50	22.17
PARTIAL	Pikeville, TN PKVLTNXADS0 (Not Covered Under TN-2 Market)	3,925	113.40	34.61			
NONE	Nine Mile, TN NNMLTNXADS0	1,330	52.37	25.40			
NONE	College Station, TN CLSTTNXADS0	1,435	60.37	23.77			
PARTIAL	Fall Creek Falls, TN FCFLT NXADS0 (Covered Under TN-2 Market)	997	62.35	15.99	3,605	131.10	27.50
PARTIAL	Fall Creek Falls, TN FCFLT NXADS0 (Not Covered Under TN-2 Market)	2,608	68.75	37.93			
NONE	Dunlap, TN DNLPTNXADS0	10,092	251.50	40.13			
Total Population Coverage (2000 Census Blocks):		21,838			8,981		
Total Coverage Area (square mile):			737.84			373.60	
Total Density				29.60			24.04
<u>TWIN LAKES</u>							
ENTIRE	Chestnut Mound, TN CHMNTNXARS0	1,669	49.67	33.60	1,669	49.67	33.60
NONE	Celina, TN CELNTNXADS0	4,518	135.90	33.25			
NONE	Moss, TN MOSSTNXADS0	2,062	70.19	29.38			
NONE	Gainesboro, TN GNBOTNXADS0	8,503	181.10	46.95			
NONE	Livingston, TN LVTNTNXADS1	13,970	301.00	46.41			
PARTIAL	Cookeville South, TN CKVLTNXBDS0 (Covered Under TN-2 Market)	60	0.89	67.64	6,209	31.69	195.93
PARTIAL	Cookeville South, TN CKVLTNXBDS0 (Not Covered Under TN-2 Market)	6,149	30.80	199.62			
NONE	Crawford, TN CRFRTNXARS0	2,316	104.50	22.16			
PARTIAL	Baxter, TN BXTRTNXADS0 (Covered Under TN-2 Market)	622	27.96	22.25	7,989	150.30	53.15
PARTIAL	Baxter, TN BXTRTNXADS0 (Not Covered Under TN-2 Market)	7,367	122.34	60.22			
NONE	Rickman, TN RKMNTNXARS0	5,046	86.24	58.51			
NONE	North Springs, TN NRSPTNXARS0	690	53.43	12.91			
NONE	Granville, TN GRVITNXARS0	726	33.46	21.70			
NONE	Highland, TN HGLDTNXARS0	740	43.99	16.82			
NONE	Jamestown, TN JMTWTNXADS1	12,910	413.20	31.24			
NONE	Clarkrange, TN CLRKTNXARS0	4,851	157.00	30.90			
NONE	Byrdstown, TN BYTWTNXARS0	3,394	85.13	39.87			
Total Population Coverage (2000 Census Blocks):		75,593			15,867		
Total Coverage Area (square mile):			1,896.80			231.66	
Total Density				39.85			68.49
<u>CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC</u>							
NONE	Martin, TN MARTTNXADS0	14,569	93.43	155.93			
NONE	Dresden, TN DRSDTNXADS0	6,206	107.90	57.52			
NONE	Sharon, TN SHRNTNXADS0	1,514	21.17	71.52			
NONE	Latham, TN LTHMTNXARS0	814	33.70	24.15			
NONE	Palmer'sville, TN PLVLTNXARS0	1,478	80.81	18.29			
NONE	Sidonia, TN SIDNTNXARS0	1,020	31.31	32.58			
PARTIAL	Pleasant Hill, TN PLHLTNXARS0 (Covered Under TN-2 Market)	6	0.49	12.16	3,822	66.77	57.24
PARTIAL	Pleasant Hill, TN PLHLTNXARS0 (Not Covered Under TN-2 Market)	3,816	66.28	57.58			
NONE	Crossville, TN CSVLTNXADS0	32,633	385.50	84.65			
ENTIRE	McMinnville, TN MMVLTNXADS0	9,699	11.91	814.36	9,699	11.91	814.36
PARTIAL	Cookeville, TN CKVLTNXADS0 (Covered Under TN-2 Market)	80	2.54	31.47	37,558	116.40	322.66
PARTIAL	Cookeville, TN CKVLTNXADS0 (Not Covered Under TN-2 Market)	37,478	113.86	329.16			
NONE	Cookeville, TN ALGDTNXARS0	5,725	32.75	174.81			
NONE	Tansi, TN TANSTNXARS0	7,473	125.70	59.45			
PARTIAL	Sparta, TN SPRTTNXARS0 (Covered Under TN-2 Market)	11,120	176.60	62.97	11,168	177.20	63.02
PARTIAL	Sparta, TN SPRTTNXARS0 (Not Covered Under TN-2 Market)	48	0.60	80.00			
NONE	Monterey, TN MTRYTNXARS0	6,810	132.30	51.47			
Total Population Coverage (2000 Census Blocks):		140,489			62,247		
Total Coverage Area (square mile):			1,416.85			372.28	
Total Density				99.16			167.20

EXHIBIT A

		Total ILEC Service Area			Proposed Advantage ETC Service Area		
Coverage	ILEC by Wire Center	Population	Square Miles	Density	Population	Square Miles	Density
<u>UNITED</u>							
NONE	College Grove, TN CPHLTNXADS2	13,824	280.70	49.25			
NONE	Nolensville, TN NLVLTNXARS1	12,518	49.08	255.05			
NONE	Unionville, TN UNVLTNXARS0	4,809	75.65	63.57			
PARTIAL	Estill Springs, TN ESSPTNXARS0 (Covered Under TN-2 Market)	3	0.06	49.85	4,316	33.13	130.27
PARTIAL	Estill Springs, TN ESSPTNXARS0 (Not Covered Under TN-2 Market)	4,313	33.07	130.42			
Total Population Coverage (2000 Census Blocks):		35,467			4,316		
Total Coverage Area (square mile):			438.56			33.13	
Total Density				80.87			130.27
<u>BEN LOMAND (ACS Proposes to Serve the Entire Service Area)</u>							
ENTIRE	Beech Grove, TN BCGVTNXARS0 (Covered Under TN-2 Market)	2,127	56.70	37.51	2,127	56.70	37.51
ENTIRE	Beech Grove, TN BCGVTNXARS0 (Not Covered Under TN-2 Market)	703	25.62	27.44	703	25.62	27.44
ENTIRE	Beersheba, TN BRSHTNXARS0	978	62.63	15.62	978	62.63	15.62
ENTIRE	Bon Decroft, TN DRSTTNXARS0 (Covered Under TN-2 Market)	1,340	51.11	26.22	1,340	51.11	26.22
ENTIRE	Bon Decroft, TN DRSTTNXARS0 (Not Covered Under TN-2 Market)	24	0.42	57.14	24	0.42	57.14
ENTIRE	Centertown, TN CNTWTNXARS0	4,995	73.15	68.28	4,995	73.15	68.28
ENTIRE	Dibrell, TN DBRLTNXARS0	2,871	45.97	62.45	2,871	45.97	62.45
ENTIRE	Doyle, TN DOYLTNXARS0	3,301	49.54	66.63	3,301	49.54	66.63
ENTIRE	Hillsboro, TN HLBOTNXARS0	3,924	90.69	43.27	3,924	90.69	43.27
ENTIRE	Laager, TN LAGRTNXARS0	4,145	88.63	46.77	4,145	88.63	46.77
ENTIRE	McMinnville Rural, TN MMRLTNXADS0	17,723	294.60	60.16	17,723	294.60	60.16
ENTIRE	Monteagle, TN MTEGTXARS0 (Covered Under TN-2 Market)	2,210	27.91	79.18	2,210	27.91	79.18
ENTIRE	Monteagle, TN MTEGTXARS0 (Not Covered Under TN-2 Market)	1,145	43.33	26.43	1,145	43.33	26.43
ENTIRE	Old Zion, TN OLZITNXARS0 (Covered Under TN-2 Market)	6,211	106.10	58.54	6,211	106.10	58.54
ENTIRE	Old Zion, TN OLZITNXARS0 (Not Covered Under TN-2 Market)	57	0.50	114.00	57	0.50	114.00
ENTIRE	Pelham, TN PLHMTNXARS0	924	50.47	18.31	924	50.47	18.31
ENTIRE	Rock Island, TN RCISTNXARS0	2,695	44.50	60.56	2,695	44.50	60.56
ENTIRE	Sparta Rural, TN SPRLTNXARSC	1,514	4.01	377.84	1,514	4.01	377.84
ENTIRE	Spencer, TN SPNCTNXARS0	3,147	87.31	36.04	3,147	87.31	36.04
ENTIRE	Tracy City, TN TRCYTNXARS0	4,190	51.68	81.08	4,190	51.68	81.08
ENTIRE	Viola, TN VIOLTNXARS0	2,905	60.08	48.35	2,905	60.08	48.35
Total Population Coverage (2000 Census Blocks):		67,129			67,129		
Total Coverage Area (square mile):			1,314.95			1,314.95	
Total Density				51.05			51.05
<u>DTC (ACS Proposes to Serve the Entire Service Area)</u>							
ENTIRE	Smithville, TN (Covered Under TN-2 Market)	33,943	640.80	52.97	33,943	640.80	52.97
ENTIRE	Smithville, TN (Not Covered Under TN-2 Market)	6,293	178.10	35.33	6,293	178.10	35.33
Total Population Coverage (2000 Census Blocks):		40,236			40,236		
Total Coverage Area (square mile):			818.90			818.90	
Total Density				49.13			49.13

Exhibit B – Map of Advantage’s Proposed ETC Service Area



March 30, 2004

Exhibit C – Declaration

Declaration of Leslie Greer

I, Leslie Greer, do hereby declare under penalty of perjury the following:

1. I am the CEO of Advantage Cellular Systems, Inc.
2. I have read the foregoing “Second Supplement to Petition of Advantage Cellular, Inc. to be Designated as an Eligible Telecommunications Carrier.” I have personal knowledge of the facts set forth therein, and believe them to be true and correct.

_____/s/____

Leslie Greer

_____/5/17/2004____

Date

CERTIFICATE OF SERVICE

I, Anita Britton, hereby certify that a copy of the foregoing Second Supplement was served on May 18, 2004, by first-class United States mail, postage prepaid, on the individuals and companies listed below:

Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Dekalb Telephone Cooperative, Inc.
d/b/a DTC Communications
P.O. Box 247
111 High Street
Alexandria, TN 37012-0247

BellSouth Telecommunications Inc.
26941 Cabot Road #134
Laguna Hills, CA 92653

Ben Lomand Rural Telephone Cooperative Inc.
311 N Chancery St
P O Box 670
McMinnville, TN 37111

Bledsoe Telephone Cooperative Inc.
203 Cumberland Avenue
P.O. Box 609
Pikeville, TN 37367-0609

Citizens Telecommunications Company of Tennessee d/b/a Frontier Communications
250 South Franklin Street
Cookeville, TN 38501

North Central Telephone Cooperative Inc.
872. E. Hwy. 52 Bypass
PO Box 70
Lafayette, TN 37083

Twin Lakes Telephone Cooperative Corporation
201 Gore Street
PO Box 67
Gainesboro, TN 38562-0067

Mr. Paul Garnett
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mr. Thomas Buckley
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
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/s/
Anita Britton